

## CODE OF ETHICS

TRATAMIENTOS DE AGUA VDF, SL ("**Tratamientos de Agua VDF**") is a company based in L'Ametlla del Vallès that is dedicated to the marketing of water treatment devices as well as other products and services related to the field of nutrition and the well-being of people, throughout the Spanish territory as well as in Europe, America and Africa.

Tratamientos de Agua VDF and related companies have had strict compliance with legal regulations as a guide for their business activity, as well as a firm commitment to ethical and responsible behavior towards their employees, customers, suppliers, external collaborators and society at large. its set.

The administration of Tratamientos de Agua VDF, through this Code of Ethics, intends to highlight the ethical principles and values that are part of the society's culture and that inspire its action.

This Code of Ethics configures the fundamental norm of Tratamientos de Agua VDF and must govern the actions of all employees, managers and administrators. For these purposes, as indicated, a channel will be created to make inquiries and proposals in relation to the Code of Ethics and regulations that develop it, as well as to monitor possible breaches that, where appropriate, are subject to sanction.

## **CODE OF ETHICS**

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## SECTION I – INTRODUCTION

### Article 1. PURPOSE OF THE CODE OF ETHICS

- 1.1 The Code of Ethics establishes an ethical reference framework and general guidelines for action that must be complied with by all persons included in its scope of action as defined in article 2 below (the “**Subject Persons**”).
- 1.2 The set of values, principles, rules and guidelines for action set forth in this Code of Ethics constitute the ethical model of behavior that must inspire and govern the actions of Subject Persons at all times.
- 1.3 This Code of Ethics will be developed through internal rules that will establish action policies and protocols in specific areas of the Company (the “**Internal Rules**”).

### Article 2. SCOPE OF APPLICATION AND PERSONS SUBJECT

#### 2.1 Scope of application

The Code of Ethics applies to Tratamientos de Agua VDF as well as, automatically, to companies that have the company Tratamientos de Agua VDF as administrator and/or have a dependency direct functional of it.

The Code of Ethics is also applicable to the companies of the VDF Water Treatment group of companies that at any time are part of it according to the definition established in article 42 Code Commercial

From now on, we will call the group of companies to which this Code of Ethics and its Internal Regulations apply as “**Group of Companies**” or “**the Company**”.

#### 2.2 Persons Subject

Persons Subject to the Code of Ethics are those persons who, with respect to any of the companies included in the scope defined in section 2.1, have the following circumstances:

- a. The ADMINISTRATORS of any of the companies or entities related to the Company defined in the previous section 2.1.
- b. DIRECTORS and other EMPLOYEES of any of the companies or entities linked to the Company defined in the previous section 2.1, regardless of their hierarchical level, geographical or functional location or the company of the Group of Companies in which they collaborate.

### Article 3. APPROVAL AND MODIFICATION

- 3.1 The Code of Ethics has been approved by the administration of VDF Water Treatments.
- 3.2 The Code of Ethics must be reviewed periodically in order to keep it appropriate to the circumstances existing at all times in the Company, the business environment in which it interacts and society as a whole. Any modification of the CODE OF ETHICS must be approved by the Company's administration and communicated to all Subject Persons.

#### **Article 4. ACCEPTANCE AND COMPLIANCE**

- 4.1 As indicated, the Company's Regulatory Compliance Officer will be in charge of informing all Subject Persons of the existence and content of this Code of Ethics and ensuring their acceptance.
- 4.2 The people who, in the future, join the Company will expressly accept the values, principles, norms and guidelines of conduct contemplated in this Code of Ethics.

### **SECTION II – GUIDING PRINCIPLES OF THE CODE OF ETHICS**

#### **Article 5. GENERAL PRINCIPLES**

The Company, in its actions, will be governed by the following principles and values:

1. Act respecting the ethical principles of integrity, honesty, responsibility and transparency.
2. Comply with the legal regulations applicable in each of the countries in which the Group of Companies has some type of activity, acquires material or sells its products.
3. Draft and approve internal regulations in coherence and in strict compliance with current legislation, always prevailing in case of conflict.
4. Avoid conflict of interest between the subject persons and the companies of the Group of Companies.
5. Maintain the utmost confidentiality regarding the information of the Group of Companies to which the Subject Persons have access due to their activity.
6. Guarantee equal opportunities and non-discrimination of the subject persons.
7. Ensure that all individuals and legal entities that maintain any type of labor, economic, social and/or industrial relationship with the Company receive fair and dignified treatment.
8. Ensure a culture of regulatory compliance and the Code of Ethics.

#### **Article 6. COMPLIANCE WITH LEGAL REGULATIONS AND INTERNAL REGULATIONS**

- 6.1 Subject Persons must:
  - a. Know and comply with the LAWS IN FORCE in the countries in which the Company develops or intends to develop its business.
  - b. Know and comply with the INTERNAL REGULATIONS of the Group of Companies that affect their work, not being able, in any case, to participate in acts that may compromise respect for the principle of legality.

“Internal Rules” are understood to be the main protocols and policies that develop this CODE OF ETHICS. These Internal Rules will be developed by the other rules, procedures and instructions self-imposed by the Company

Ignorance of the legislation and internal regulations applicable to the Company cannot justify its non-compliance.

- 6.2 The Company must promote the knowledge and culture of compliance by all Subject Persons with the legislation and internal regulations applicable to their activities, through dissemination, information and adequate training.

## **Article 7. BASIC LEGISLATION**

The Subject Persons will have to comply with and enforce the following basic legislation.

- 7.1 NationsGlobal Compact: The Company complies with the United Nations Global Compact (Global Compact) and has adopted its principles of conduct and action in matters of human rights, labor rights, the environment, and the fight against corruption.
- 7.2 Workers' rights and safety: The Company must guarantee compliance with labor regulations and workers' rights, especially in the following areas: freedom of association and effective recognition of the right to collective bargaining, the elimination of all form of forced or coerced labor, the eradication of child labor and the abolition of discrimination practices in employment, guaranteeing equality between them.

The Company must guarantee safety at work, complying with the regulations on occupational risk prevention, both in regard to its own employees and in relation to the applicable regulations regarding employees of third-party companies that access its centers. of work.

- 7.3 Defense of competition: Comply with the legislation on the defense of competition, as well as respecting the principles and rules of fair competition, strictly supervising the Company's agreements with third-party companies or in the acquisition of businesses that may have an effect Negative about the competition.
- 7.4 Fight against corruption: The Company does not tolerate any act of corruption in any of its modalities. For these purposes, it will implement an Internal Regulation for the Prevention of Corruption in all the ways that it can be executed, actively or passively.

In the event of any doubt or observation of cases of corruption, the corresponding Ethics Committee must be informed.

- 7.5 Prevention of money laundering and terrorist financing: The Company will comply with the national and international provisions issued to prevent money laundering.
- 7.6 Compliance with accounting/financial regulations: The Company's economic-financial information will faithfully reflect its economic, financial, and equity reality, in accordance with generally accepted accounting principles and applicable international financial reporting standards.

- 7.7 Compliance with tax and fiscal regulations: The Company will comply with tax and fiscal regulations, reducing significant fiscal risks.
- 7.8 Protection of personal data: The Company will guarantee the privacy of personal data, establishing the appropriate security measures and complying with current legislation
- 7.9 Protection of intellectual and industrial property: The Company will preserve, in all its fields of action, the rights of intellectual and industrial property of the Company to the extent that these intangible goods constitute one of its most valuable assets. For these purposes, it will maintain a careful conduct with the confidentiality and preservation of industrial secrets, as well as respect the intellectual and industrial property rights of third parties.
- 7.10 Environment: Respect in its business and manufacturing activities the regulations on waste management caused by its production chain, efficiently and in strict compliance with current regulations. Establish the appropriate prevention and control measures to achieve the highest standards of environmental protection.

#### **Article 8. CONFIDENTIALITY**

- 8.1 The Company considers information and knowledge as one of its main and essential assets for business management, therefore they are subject to special protection.

"Confidential Information" is that written or verbal information that contains, with an illustrative and non-limiting nature, technical, financial and commercial information, models, names of potential clients or partners, proposed commercial operations, new products, new projects, reports, plans, market projections, data, analyses, working papers, compilations, comparisons, studies or other documents whose disclosure may directly or indirectly harm the owner thereof.

- 8.2 The Subject Persons must treat the information and knowledge to which they have access due to their position, function or any opportunity within the Company in such a way as to guarantee their confidentiality, forcing themselves not to disclose it to third parties, including their friends and family, except when necessary for business reasons and authorized by the General Management of the Company.

In any case, it is prohibited to use confidential information for personal benefit or that of third parties.

- 8.3 This confidentiality commitment must continue after the termination of the employment relationship or provision of services with the Company.
- 8.4 Regarding the confidential information of third parties outside the Company to which any Subject Person has access due to contractual relationships or of any other type with them, such Subject Persons must comply with the confidentiality agreements signed by the Company. This information may only be disclosed when the owner of the information expressly authorizes it.

- 8.5 The Company must authorize which people can act in the environment of social networks on behalf of or on behalf of the Company, who will have to ensure the correct and appropriate use of the Company's image and respect for the ethical values described in this Code.

#### **Article 9. CONFLICTS OF INTEREST**

- 9.1 Subject Persons must avoid situations that may involve a conflict between their personal interests and those of the Company.
- 9.2 Subject Persons may not take advantage of their position in the Company to obtain personal advantages for themselves or for the Related Persons (as defined below).
- 9.3 Subject Persons may not carry out, directly or indirectly, outside the Company professional activities similar to those they may provide to the Company if this may interfere with its interests.
- 9.4 For the purposes of the provisions of the preceding sections, it shall be understood that as "Related Persons" the following persons:
- a. In the case of a natural person, the spouse, other persons with whom one is especially linked by ties of affectivity, that of their relatives in a direct, ascending or descending line, and legal persons in which administrative functions are exercised or with which a decision-making unit is constituted, directly or through an intermediary, in accordance with commercial legislation.
  - b. In the case of a legal person, its administrators or representatives, the controlling partners and the entities that form a decision-making unit, in accordance with commercial legislation.
- 9.5 People who find themselves in a situation of conflict of interest must notify the Ethics Committee once the current or possible situation of conflict of interest is noticed and, in any case, before making the decision that could be affected by the possible conflict of interest.

#### **Article 10. USE OF COMPANY GOODS AND SERVICES**

- 10.1 The Subject Persons undertake to make good use of the goods and services offered by the Company so that they are used solely for the development of their professional activities, avoiding their private use or for the benefit of own.
- 10.2 The use of Company resources by Subject Persons must be responsible and comply with security criteria, avoiding any illegal use.

#### **Article 11. GIFTS**

- 11.1 Subject persons may not offer or accept gifts or invitations in the performance of their duties within the company that may be intended to influence decision-making.
- 11.2 The subject persons may only offer or accept reasonable meals and symbolic gifts that are appropriate under the circumstances and in any case they will reject it when these behaviors may create the impression that they constitute an inappropriate influence regarding the corresponding business relationship.
- 11.3 In no case may Subject Persons receive, in their personal capacity, money from clients or suppliers, not even in the form of a loan or advance.

### **SECTION III – RELATIONS WITH STAKEHOLDERS**

#### **Article 12. STAKEHOLDERS**

- 12.1 The Company's "Stakeholders" are understood to be all those people who affect or can significantly contribute to its activity and decisions or whose actions or behavior can produce effects by the company.
- 12.2 The Company's "Stakeholders" can be grouped into the following: employees, clients and consumers, suppliers and public administrations.

#### **Article 13. EMPLOYEES**

The Company's actions towards its employees will be governed in accordance with the following principles:

- 13.1 The Company must ensure the dignity of the person and guarantee equal treatment, opportunities and non-discrimination based on sex, race, national origin, religion, beliefs, age, sexual orientation, national origin, ideology, marital status or disability.
- 13.2 The Company does not tolerate workplace harassment, for what purposes it will establish the appropriate mechanisms to prevent and, where appropriate, be able to denounce and act against this type of action.
- 13.3 Ensure respect for freedom of association and facilitate the right to individual and collective bargaining.
- 13.4 The relationship between employees must be governed by mutual respect, transparency and trust, acting in a spirit of collaboration with the rest of the Company's employees and external collaborators with the common objective of complying with the interests of the Group of Companies.
- 13.5 The selection and promotion of employees must be based on the skills, capacity, professionalism and attitude towards the Company that will be duly accredited and justified.
- 13.6 The Company will seek and facilitate the completion of training in the field of legislation and internal regulations that are applicable to it, in attention to the functions and activities that each of the employees perform within the Group of Companies. Employees are obliged to carry out



mandatory training and will maintain a favorable predisposition to carry out voluntary training.

- 13.7 The Company will seek and ensure that the working conditions of its Employees are safe for their health, for which purposes it will strictly comply with the regulations on occupational risk prevention, provide medical assistance, carry out periodic medical check-ups, providing the resources and necessary means, as well as promoting actions to improve professional and personal reconciliation.

#### **Article 14. CLIENTS AND CONSUMERS**

The Company's actions towards its clients and consumers will be governed in accordance with the following principles:

- 14.1 Maintain and foster the trust that clients and consumers have with the Company, promoting excellence and offering products of the highest quality. and the best service, providing a differential value compared to the competition.
- 14.2 Provide customers with rigorous, sufficient, truthful, timely and adequate information.
- 14.3 Offer truthful advertising, complying with current regulations on advertising.
- 14.4 Compete in the market fairly and reject all kinds of misleading, fraudulent or malicious conduct.
- 14.5 Offer personalized attention to consumers through the Customer Service Department.
- 14.6 Prevent and reject any type of corruption in its relations with clients.
- 14.7 Respect and enforce the contractual conditions agreed by the parties.

#### **Article 15. SUPPLIERS**

The Company's actions towards its suppliers will be governed in accordance with the following principles:

- 15.1 Establish supplier selection criteria that are objective and transparent, based mainly on criteria of quality, cost and compliance with deadlines.
- 15.2 Avoid any type of conflict of interest between personal interests and the interests of the Company, complying with internal regulations on conflicts of interest.
- 15.3 Prevent and reject any form of corruption in its relations with suppliers.
- 15.4 Respect and enforce the contractual conditions agreed by the parties.
- 15.5 Promote and require the Company's suppliers to behave diligently and comply with the above criteria in accordance with the conduct guidelines included in this Code of Ethics.

#### **Article 16. PUBLIC ADMINISTRATIONS**

Collaborate with public administrations in any relationship that the Company may maintain with them, avoiding and rejecting any form of corruption and acting transparently, strictly complying with the law and complying with their resolutions once be firm.

#### **SECTION IV - COMMUNICATION AND DISSEMINATION OF THE CODE OF ETHICS**

##### **Article 17. DISSEMINATION OF THE CODE OF ETHICS**

- 17.1 The Head of Regulatory Compliance will be responsible for disseminating the Code of Ethics and the Internal Rules to Subject Persons, with the scope deemed appropriate at any given time. according to the position and functions or types of contractual relationship with them, if deemed appropriate with the collaboration of the Human Resources manager.
- 17.2 The Regulatory Compliance Manager must carry out a periodic and exhaustive control of the Subject Persons who have signed the declaration of receipt and compliance with the code and Internal Regulations.
- 17.3 Subject Persons who join the Company for the first time will be given a copy of this Code of Ethics and Internal Rules in everything that affects them, and they will be informed about the existence of the Ethics Committee and its regulations.

##### **Article 18. ETHICS CHANNEL**

- 18.1 The Company has established a communication channel for the Subject Persons with the Ethics Committee so that the Subject Persons can consult any doubt regarding the interpretation of this Code of Ethics and the Internal Regulations, as well as report non-compliance by any of the Persons Subject to the provisions of this Code of Ethics.
- 18.2 The communication CHANNEL will consist of:
- a. Email, canal.etic@vdf.es
  - b. Postal mail, Responsible for Regulatory Compliance of VDF WATER TREATMENTS. Address at the Company's registered office.
  - c. A mailbox located on the Company's premises.
- 18.3 The procedure for answering queries or processing complaints of non-compliance will be specified in the corresponding Regulations of the Ethics Committee.
- 18.4 In any case, it will be guaranteed that the complaint of breaches of the Code of Ethics or of the Internal Rules that are made through the Ethical Channel are anonymous and confidential. The Company guarantees that there will be no type of retaliation for reporting a breach of the Code of Ethics.

#### **SECTION V – COMPLIANCE WITH THE CODE OF ETHICS**

##### **Article 19. BREACH OF THE CODE OF ETHICS AND SANCTIONS**

- 19.1 All Subject Persons must comply with this Code of Ethics in everything that affects them.
- 19.2 Non-compliance by the subject persons who are employees of the company will be penalized in accordance with labor legislation and other applicable regulations.
- 19.3 Non-compliance by the Subject Persons who are external collaborators or other interest groups will be reported and will act in accordance with the agreement in the contractual relationship or applicable legislation, which may lead to the termination of the services provided and the claim of compensation for damages. caused.

#### **Article 20. ETHICS COMMITTEE**

- 20.1 The Company will create the Ethics Committee, which is the highest body that guarantees compliance with the Code of Ethics and Internal Rules and will have its headquarters at the registered office of Tratamientos de Agua VDF.
- 20.2 By decision of the administration of Tratamientos de Agua VDF, the Ethics Committee may coincide with the Regulatory Compliance Committee and eventually with the Regulatory Compliance Officer if the previous committee has not been established.
- 20.3 In any case, the people who are part of the corresponding Ethics Committees will be obliged to operate under criteria of independence and fairness, preserve the confidentiality of all data and the actions carried out, ensure non-retaliation against employees involved in inquiries. or disciplinary file, except in case of unavoidable legal requirement.
- 20.4 The documentation of the consultations and disciplinary files and their resolutions will be archived by the Ethics Committee.

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	V01	Administration	04.30.2017	Indefinite

**ANNEX 1 – INTERNAL RULES**

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